Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1, 14-16, 18, 20-26 and 30-94 are pending in the application, with 1, 14, 16, 18, 21, 30, and 49 - 54 being the independent claims. Claims 2-13, 17, 19, and 27-29 were canceled in a previous amendment. Claims 15, 22, 33, 36, 39, 42, 45, and 48 are sought to be canceled without prejudice to or disclaimer of the subject matter therein. Claims 1, 14, 16, 18, 20, 21, 30, 49-54 are sought to be amended. New claims 55-94 are sought to be added. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendments and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Examiner Interview

On October 4, 2007, Examiner Shingles and Applicants' representative Michael Q. Lee, Reg. No. 35,239 conducted an interview meeting at the U.S. Patent & Trademark Office. Applicants' representatives thank the Examiner for the courteous and productive interview.

Rejections under 35 U.S.C. § 103

On page 2 of the Office Action, claims 1, 14-16, 18, 20-26 and 30-54 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,862,325

to Reed *et al.* (hereinafter Reed) in view of U.S. Patent No. 6,650,620 to Neogi

(hereinafter Neogi). Applicants respectfully traverse the rejection, and request that it be

withdrawn.

Differences exist between the applied references and the claimed embodiments of

the present invention. For example, claim 52 recites:

> parsing said event on the first device to recover the
> modification.

Reed describes a communication system that operates to transfer data from a

provider computer to a consumer computer through a communications network. In

particular, Reed describes communication systems that transfer objects in response to a

change in the object or other conditions. When a communications object or a changed

portion of a communications object is received, it is determined whether the received

object is a message object. If the received object is not a message object, it is determined

whether object already exists in a database of the receiver. If the received object does

not already exist in a receiver database, methods are executed that may store or delete the

received object and may execute other automatic actions (e.g., acknowledgement

operations, notification operations, etc.). If the object already exists in a receiver

database, then the object is processed to determine what changes have occurred and what

actions the receiver should then take. The version value of the received object may be

compared to the version value of the stored object. If the received object is determined

to be newer, it may be stored. Moreover, automatic actions may also be taken (e.g.,

acknowledgement operations, notification operations, etc.). *See,* Reed, col. 37, line 63 –

col. 40, line 41.

Reed does not teach or suggest parsing said event on the first device to recover the modification, as recited in claim 52. Reed describes *processing* a received object or changed portion of an object, but does not describe *parsing* an event that is representative of a change to a data object, as recited in claim 52.

Moreover, an update of a data object according to the system of Reed includes processing a received communication (e.g., a data object or updated portion of a data object) to determine if the received communication is new (i.e., a version value comparison) and storing the received communication if it is new. In contrast, according to the claims of the present invention, a received communication (e.g., an event) is parsed to determine a modification to first a data object and based on that modification, a second data object is updated. Specifically, claim 52 recites "a method in a first device for receiving information, comprising the steps of: storing a first data object in a first representation on the first device; receiving an event from a second device, wherein the event is representative of a modification to a second data object at a third device, wherein the third device is different from the first device, wherein the second device stores the second data object in a second representation, wherein the first representation is different from the second representation; parsing said event on the first device to recover the modification; and updating the first data object according to the recovered modification. Reed does not teach or suggest parsing or otherwise processing a received communication *to determine a modification*. Applicants further assert that a received data object or an updated portion of a data object does not teach or suggest an event, as recited in the claims of the present invention.

Neogi describes a communication system that routes requests from a client to an appropriate node of the communication network based on a resource status table. For example a request from a client may be transferred from a first node to a second node if the resource status table indicates that the second node has the capabilities necessary to handle the request. *See*, Neogi, col. 3, line 18 – col. 4, line 25. Neogi does not teach or suggest parsing said event on the first device to recover the modification, as recited in claim 52. Thus, Neogi does not provide the teachings missing from Reed with respect to parsing a received event.

Therefore, Applicants assert that claim 52 and its dependents are patentable over the applied references at least because neither of the applied references teaches parsing said event on the first device to recover the modification. Moreover, Applicants assert that independent claims 1, 14, 16, 18, 21, 30, and 49-51, 53, and 54 and their dependents recite similar distinguishing features as claim 52 are patentable over the applied references for at least the reasons provided above, and further in view of their own respective features.

Furthermore claim 16 also recites additional features that distinguish over the applied references. For example, claim 16 recites:

> delivering said to the second device, comprising the step of transferring said event to the second device during a sync operation.

The Examiner attempts to teach the sync aspect of claim 16 using col. 12, lines 49-51, col. 91, lines 3-7, and col. 92 line 24 – col. 93 line 10 of Reed. The referenced sections of Reed describe the transfer of objects through push and pull transactions, but not through a sync a transaction. As described in the present application, a sync

operation involves "the delivery of modification events within a larger batch delivery of information to the device and/or component when connectivity is established." *See* paragraph [0127] of the published application. Neither of the applied references teaches such an operation to transfer events. Thus, Applicants assert claim 16 is patentable over the applied references at least because neither of the applied references teaches or suggests a sync operation in addition to the remarks presented above with respect to claim 52.

Thus, Applicants assert that claims 1, 14-16, 18, 20-26 and 30-54 are patentable over the applied references. Accordingly, Applicants respectfully request that the rejection of these claims be reconsidered and withdrawn.

New Claims 55-94

New claims 55-94 depend from independent claims 1, 14, 16, 18, 21, 30, and 49 - 54 and are patentable over the applied references based at least on their dependency to their respective independent claims and further in view of their own features.

Furthermore, new claims 71 and 72 recite additional features that distinguish over the applied references. Claims 71 and 72 are reproduced below for the Examiner's convenience.

> 72. The method of claim 52, wherein the first representation and the second representation are device specific.

> 73. The method of claim 52, wherein the first representation and the second representation are platform specific.

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For example, and without limitation, claim 72 and 73 may be applied to the embodiment in which a user has a first document stored in MSWord format at his desktop computer and a second document stored in MSWord format on his mobile device (e.g., PDA). In such an embodiment, the first and second documents may include the same data and be same format (e.g., MSWord format), but the representation of the documents would be device specific and therefore different because the two devices (e.g., desktop computer and PDA) are different. Neither of the applied references teaches or suggests communications involving data objects that have device or platform dependent representations.

Accordingly, Applicants respectfully request that new claims 55-94 be passed to allowance.
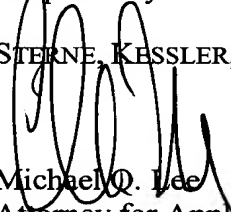
Reply to Office Action of July 25, 2007

BAYNES *et al.*
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Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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